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February 26, 2009

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: Coleman Enterprises, Inc. d/b/a Local Long Distance  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. 64.2009(e) please find attached the 2008 Annual CPNI Certification and Accompanying Statement filed on behalf of Coleman Enterprises, Inc. d/b/a Local Long Distance.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER, P.C.

  
Patrick D. Crocker

PDC/tld

cc: FCC Enforcement Bureau (2 copies via USPS Mail)  
Best Copy and Print, Inc. (via e-mail [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of Company Covered by this Certification: Coleman Enterprises, Inc.  
d/b/a Local Long Distance

Form 499 Filer ID: 808522

Name of signatory: Daniel G. Coleman

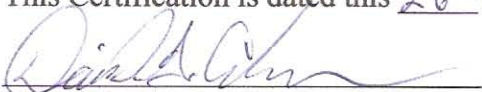
Title of signatory: President

I am the President of Coleman Enterprises, Inc. d/b/a Local Long Distance and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Coleman Enterprises, Inc. d/b/a Local Long Distance. I have personal knowledge that Coleman Enterprises, Inc. d/b/a Local Long Distance has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Coleman Enterprises, Inc. d/b/a Local Long Distance received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Coleman Enterprises, Inc. d/b/a Local Long Distance has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2008. Coleman Enterprises, Inc. d/b/a Local Long Distance will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Coleman Enterprises, Inc. d/b/a Local Long Distance is taking to protect CPNI.

This Certification is dated this 26<sup>th</sup> day of February, 2009.



Daniel G. Coleman

President

Coleman Enterprises, Inc. d/b/a Local Long Distance

## ACCOMPANYING STATEMENT

Coleman Enterprises Inc. d/b/a Local Long Distance's ("Coleman") operating procedures ensure that Coleman is in compliance with the requirements set forth in the Commission's CPNI rules as set forth in 47 C.F.R. Part 64, Subpart U (the "**CPNI Rules**") as follows:

- Coleman's operating procedures prohibit the use, disclosure or release of CPNI, except as permitted or required under 47 U.S.C. § 222(d) and Rule 64.2005. Coleman does not use disclose or permit access to CPNI for any purpose (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.
- Coleman's operating procedures prohibit the use of CPNI in sales or marketing campaigns. Coleman does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt in" or "opt out" approval under the Commission's CPNI Rules. Coleman does not currently solicit "opt in" or "opt out" customer approval for the use or disclosure of CPNI.
- Coleman takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Coleman's operating procedures include safeguards designed to identify and protect against unauthorized use, disclosure or access to CPNI. Coleman authenticates a customer prior to disclosing CPNI based on customer-initiated telephone contact or an in-store visit.
- Coleman maintains a record of all instances where CPNI was disclosed or provided to third parties and where third parties were permitted access to CPNI. Records of all instances where CPNI was disclosed or provided to third parties, or where third parties were permitted access to CPNI, are maintained for a minimum of one year.
- Coleman does not release call detail CPNI over the telephone, based on customer-initiated telephone contact, unless the customer first provides a password that is not prompted by Coleman asking for readily available biographical information or account information or unless the customer is able to provide the relevant call detail information without Coleman assistance. If a customer does not provide a password and is not able to provide the relevant call detail information without Coleman assistance, Coleman only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.
- Coleman provides customers with access to CPNI at Coleman's retail locations only if the customer presents a valid photo ID and the valid photo ID matches an authorized name on the customer account. If a customer is not able to provide a valid photo ID, he or she may instead provide the account password in the same manner required for customer-initiated telephone contact. If a customer is not able to provide a valid photo ID or account password in connection with an in person inquiry, Coleman only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.

- Coleman has established a system of passwords and password protection. For a new customer establishing service, Coleman requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Coleman must first authenticate the customer without the use of readily available biographical information or account information, for example by calling the customer at the telephone Number of record or by using a personal identification number (PIN) or similar method to authenticate a customer.
- If a customer password is forgotten or lost, Coleman uses a backup customer authentication method that is not based on readily available biographical information or account information.
- If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on a customer-initiated telephone call by asking Coleman to send the call detail information to an address of record or by Coleman calling the customer at the telephone number of record. If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on personal inquiry at a retail location by providing a valid photo ID that matches an authorized name on the customer account or by asking Coleman to send the call detail information to an address of record or by Coleman calling the customer at the telephone number of record.
- Coleman has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication, address of record or other critical account information is created or changed.
- Coleman does not currently provide online account access to customers.
- All Coleman employees with access to or a need to use CPNI have been trained regarding Coleman's operating procedures and as to when they are and are not authorized to use, disclose or permit access to CPNI. Coleman's employees have been trained regarding the types of information that constitute CPNI and Coleman's safeguards (such as employee restrictions, password protection, supervisory review, etc.) applicable to Coleman's handling of CPNI. Coleman's employee manual includes a disciplinary policy requiring compliance with Coleman's operating procedures and sets forth penalties for noncompliance, up to and including termination of employment.
- Coleman has appointed a compliance officer and established a supervisory review process regarding Coleman's compliance with the Commission's CPNI Rules. Coleman's operating policies require that employees confer with the compliance officer if they are unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI. Coleman's operating policies require that the compliance officer confer with Coleman's legal counsel if he or she is unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI.

- Coleman's compliance officer has personal knowledge of Coleman's operating procedures and is authorized, as an agent of Coleman, to sign and file an annual CPNI compliance certification with the Commission.
- All Coleman employees and the compliance officer are trained to identify and protect against activity that is indicative of pretexting. All Coleman employees and the compliance officer are required to report any breach or potential breach of CPNI safeguards and/or any customer complaints regarding CPNI. In the event of a CPNI breach, Coleman's operating procedures require compliance with the Commission's CPNI Rules regarding notice to law enforcement and customers. Coleman must maintain records of any discovered breaches and notifications to the Secret Service and the FBI regarding those breaches, as well as the Secret Service and the FBI responses to such notifications, for a period of at least two years.

## **STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS**

- A. During Calendar Year 2008, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2008, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

NONE

- C. During Calendar Year 2008, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

**SUMMARY OF CUSTOMER COMPLAINTS  
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2008, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2008, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2008, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2008, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE